

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

MARLAYNA G. TILLMAN,	:	
	:	
Plaintiff,	:	C.A. Number: 04-1314(SLR)
	:	
v.	:	
	:	
THE PEPSI BOTTLING GROUP, INC.,	:	
and TEAMSTERS LOCAL UNION 830	:	
	:	
Defendants.	:	

MOTION TO WITHDRAW AS COUNSEL FOR PLAINTIFF

Pursuant to Rule 83.7 of the Local Rules of Civil Practice and Procedure of the United States District Court for the District of Delaware, the undersigned Lori A. Brewington and Jeffrey K. Martin and the law office of Margolis Edelstein hereby moves the Court for an order allowing them to withdraw as counsel for plaintiff. This motion is based on the following facts:

1. Pursuant to Rule 1.16(b)(5) and (6) of the Delaware Lawyers Rule of Professional Conduct, the representation has been rendered unreasonably difficult by Marlayna Tillman and other good cause for withdrawal exists.
2. In particular, plaintiff and the undersigned counsel have had a fundamental breakdown with regard to the manner in which the case is to be handled.
3. The undersigned believes that the withdrawal "can be accomplished without material adverse effect on the interest of the client" pursuant to the Delaware Lawyers' Rules of Professional Conduct, Rule 1.16(b).

WHEREFORE, the undersigned counsel respectfully requests leave of Court to terminate their representation of Marlayna Tillman in this matter and to withdraw as counsel in the above-captioned matter.

MARGOLIS EDELSTEIN



Jeffrey K. Martin, Esq. (ID No. 2407)
Lori A. Brewington, Esq. (ID No. 4522)
1509 Gilpin Avenue
Wilmington, DE 19806
(302) 777-4680
Attorney for Plaintiff

DATED: December 14, 2005

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

MARLAYNA G. TILLMAN,

Plaintiff, : C.A. Number: 04-1314(SLR)

v. :

THE PEPSI BOTTLING GROUP, INC.,
and TEAMSTERS LOCAL UNION 830

Defendants. :

CERTIFICATE OF SERVICE

I certify that on December 14, 2005, two copies of the *Motion to Withdraw as Counsel for Plaintiff* were delivered by U.S. First Class Mail, postage prepaid, to the following:

William M. Kelleher, Esquire
Ballard Spahr Andrews & Ingersoll, LLP
919 Market Street, 17th Floor
Wilmington, DE 19801-3034

Clifford B. Hearn Jr. Esquire
606 Market Street Mall
P.O. Box 1205
Wilmington, DE 19899

Ms. Marlayna Tillman
497 Linden Boulevard, Unit C-7
Brooklyn, NY 11203



A handwritten signature in black ink, appearing to read "Jeffrey K. Martin". Below the signature, the name "Jeffrey K. Martin, Esquire" is printed in a smaller, standard font.